

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	)	
ex rel.	)	
INTERNATIONAL BROTHERHOOD OF	)	
ELECTRICAL WORKERS, LOCAL UNION	)	Civil Action No. 09-4230
NO. 98,	)	
	)	
Relator/Plaintiff,	)	
	)	
v.	)	
	)	
THE FARFIELD COMPANY	)	
Defendant.	)	

**CERTIFICATION PURSUANT TO FEDERAL RULE OF  
CIVIL PROCEDURE 37(a) AND LOCAL RULE 26.1(f)**

Pursuant to Federal Rule of Civil Procedure 37(a) and Local Rule 26.1(f) of the Rules of Civil Procedure for the Eastern District of Pennsylvania, the undersigned hereby certifies, as set forth in the foregoing motion, that counsel for Plaintiff has attempted in good faith to resolve this discovery matter without the need for Court intervention and that, despite these efforts, the parties have been unable to resolve this dispute. Through correspondence specifically identified in and attached to the motion herein, Plaintiff's counsel has repeatedly requested the disputed discovery responses from Defendants, and provided explanations regarding the relevancy of the specific requests, so as to avoid a Motion to Compel.

BY: /s/ Richard B. Sigmond  
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Date: October 5, 2015

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